

THE HONORABLE BENJAMIN H SETTLE

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

RSM MCGLADREY, INC.,

Plaintiff,

v.

JOHN KILEY, MARTIN JUERGENS, and  
CYNTHIA STRONG,

Defendants.

CIVIL ACTION NO. 09-05765 BHS

**STIPULATED AND AGREED JOINT  
MOTION TO STAY PROCEEDINGS**

NOTE ON MOTION CALENDAR:  
FEBRUARY 11, 2010

Plaintiff RSM McGladrey, Inc. ("RSM") and Defendants John Kiley, Martin Juergens, and Cynthia Strong, who are all the parties to this action, hereby respectfully request an order staying all proceedings in this case until September 20, 2010. Good cause supports this request. The parties have reached a settlement of their disputes, and have executed a settlement agreement, the terms of which are subject to certain confidentiality restrictions. The parties stipulate and agree that this case should be stayed until September 20, 2010 to allow the implementation and effectuation of the parties' settlement, which would make further proceedings in this case unnecessary. Thus, it is in the best interests of the parties and this Court, as a matter of judicial economy, to stay this action as requested. The parties therefore respectfully request that the Court enter the requested stay, as set forth on the proposed order submitted concurrently herewith.

1 Respectfully submitted this 11th day of February, 2010.

2 DORSEY & WHITNEY LLP

3  
4 /s/ Shawn J. Larsen-Bright

5 Curt Roy Hine

6 Shawn J. Larsen-Bright

7 701 Fifth Ave., Suite 6100

8 Seattle, WA 98104

9 (206) 903-8800

10 hineline.curt@dorsey.com

11 larsen.bright.shawn@dorsey.com

12 *Attorneys for Plaintiff*

13 LANE POWELL PC

14 /s/ Christopher B. Wells

15 (by email authorization)

16 Christopher B. Wells

17 1420 Fifth Ave., Suite 4100

18 Seattle, WA 98101

19 (206) 223-7000

20 wellsc@lanepowell.com

21 *Attorney for Defendants*